

In The Matter Of:

Stephen Packman

(b) (6), (b) (7)(C)

February 21, 2019



Original File (b) (6), (b) (7)(C).prn

Min-U-Script® with Word Index

BEFORE THE
ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:) Case #:
Stephen Packman) EPA-R10-2022-001402
_____)

Thursday

February 21, 2019

INTERVIEW OF (b) (6), (b) (7)(C)

((b) (6), (b) (7)(C))

APPEARANCES:

On behalf of EPA:

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Also Present:

Greg Goldberg (Holland & Hart)

Joe Teig (Holland & Hart)

I N D E X

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1	Sample mix design sheet	12
2	Disposal record	14

P R O C E E D I N G S

(b) (6), (b) (7)(C) : Record this conversation. It's for notetaking purposes. I use a camera, but it's not pointing at you or anything like that. It's just the audio record.

(b) (6), (b) (7)(C) : Okay.

(b) (6), (b) (7)(C) : Just to -- just to let you know. I'm just going to be asking you questions about your job.

(b) (6), (b) (7)(C) -- (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) .

(b) (6), (b) (7)(C) : No.

(b) (6), (b) (7)(C) : (b) (6), (b) (7)(C) ?

(b) (6), (b) (7)(C) : Yeah.

(b) (6), (b) (7)(C) : Congratulations.

(b) (6), (b) (7)(C) : Thank you.

(b) (6), (b) (7)(C) : So I'm just going to ask you just questions about how the process works out there for treatments. So, all right, the camera is on and it's recording. I'm with (b) (6), (b) (7)(C) from EPA. Greg Goldberg and Joe Teig from Holland & Hart. And (b) (6), (b) (7)(C) .

(b) (6), (b) (7)(C) : (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) : (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C) : Mm-hmm.

(b) (6), (b) (7)(C) : And (b) (6), (b) (7)(C) is a (b) (6), (b) (7)(C) .

(b) (6), (b) (7)(C) : Correct.

1 (b) (6), (b) (7)(C) : What was your job title (b) (6), (b) (7)(C)
2 (b) (6), (b) (7)(C) ?

3 (b) (6), (b) (7)(C) : (b) (6), (b) (7)(C)

4 (b) (6), (b) (7)(C) : And then how long did you work
5 out there?

6 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) .

7 (b) (6), (b) (7)(C) : So as a (b) (6), (b) (7)(C) ,
8 what was your responsibilities?

9 (b) (6), (b) (7)(C) The process, the waste, (b) (6), (b) (7)(C)
10 (b) (6), (b) (7)(C)
11 -- (b) (6), (b) (7)(C)
12 (b) (6), (b) (7)(C) .

13 (b) (6), (b) (7)(C) : What kind of -- was there a
14 specific waste that would only go to new stab versus going
15 to old stab, anything like that?

16 (b) (6), (b) (7)(C) : Well, there was a lot of it that
17 was split up. But mainly the dusty material would go our
18 way.

19 (b) (6), (b) (7)(C) : Would (b) (6), (b) (7)(C) also take like
20 flammables, and solvents, and things like that in there or
21 was it just strictly dusty?

22 (b) (6), (b) (7)(C) : (b) (6), (b) (7)(C) would take it. But if (b) (6), (b) (7)(C) didn't
23 need to take it over there, (b) (6), (b) (7)(C) wouldn't take it.

24 (b) (6), (b) (7)(C) : Is flammables some of the things
25 that you treat out there, flammable material?

1 (b) (6), (b) (7)(C): It just depends what it is, because
2 we do send a lot of that off-site.

3 (b) (6), (b) (7)(C) : Can you just kind of walk me
4 through the process of -- we have some, in this case some
5 magnesium dust that needs to be or magnesium powder that
6 needs to be disposed of. How would that go about like
7 from kind of start to finish and how your guys, you would
8 get your guys to do that?

9 (b) (6), (b) (7)(C): Okay. I can give you some. I was
10 (b) (6), (b) (7)(C)

11 (b) (6), (b) (7)(C) : I understand that. But you --

12 (b) (6), (b) (7)(C): So I don't know what the mix was
13 calling for or anything. So I can tell you steps that (b) (6), (b)
14 do as the waste comes in. It is sampled and looked at.
15 And then after it's taken to the lab, the lab will test it
16 also with their stuff that they do. And then they release
17 a mix design to (b) (6), (b) (7)(C) At that point, (b) (6), (b) read it and see how
18 (b) (6), (b) (7)(C) supposed to process it. They give (b) (6), (b) directions
19 what's done first, and stir, and sample, add other stuff
20 to it. So everything calls for a little bit different,
21 because (b) (6), (b) do process a lot of stuff.

22 (b) (6), (b) (7)(C) Would (b) (6), (b) (7)(C) employees or people
23 under (b) (6), (b) (7)(C) be the ones like opening up the
24 drums to take samples of them or is that a different --

25 (b) (6), (b) (7)(C): That's another area.

1 (b) (6), (b) (7)(C) : Okay. So people who work in (b) (6), (b) (7)(C)
2 (b) (6), (b) (7)(C) just strictly treat waste inside new stab. Is that
3 all of their job responsibilities?

4 (b) (6), (b) (7)(C): Yes. Treat it and dispose of it,
5 so (b) (6), (b) (7)(C) make sure that's there.

6 (b) (6), (b) (7)(C) : Do (b) (6), (b) (7)(C) frequently get metal
7 waste, powdered wastes out there to dispose of?

8 (b) (6), (b) (7)(C): It depends what frequently is.

9 (b) (6), (b) (7)(C) : I know it's kind of hard for --

10 (b) (6), (b) (7)(C): Yeah.

11 (b) (6), (b) (7)(C) : For (b) (6), (b) (7)(C) . (b) (6), (b) (7)(C) get
12 everything under the sun.

13 (b) (6), (b) (7)(C): I can say once a month. Is that
14 frequently to you and not to me, but --

15 (b) (6), (b) (7)(C) : Well, I guess instead of
16 frequently, what's typical?

17 (b) (6), (b) (7)(C) Typical?

18 (b) (6), (b) (7)(C) : Yeah, what like --

19 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) get it throughout the year is
20 the best for me to answer.

21 (b) (6), (b) (7)(C) : So multiple times a year (b) (6), (b) (7)(C)
22 be treating them?

23 (b) (6), (b) (7)(C): Mm-hmm, mm-hmm.

24 (b) (6), (b) (7)(C) : Had (b) (6), (b) (7)(C) been a part of
25 (b) (6), (b) (7)(C) there treating any magnesium waste,

1 powdered waste?

2 (b) (6), (b) (7)(C) I would say yes.

3 (b) (6), (b) (7)(C) : Do you remember -- I know you
4 (b) (6), (b) (7)(C) , this treatment,
5 but how had other magnesium waste get treated in the past.

6 (b) (6), (b) (7)(C): It's a slow process.

7 (b) (6), (b) (7)(C) : Okay. Can you kind of explain
8 to me?

9 (b) (6), (b) (7)(C): With water. You put water in the
10 pit first and that's how they're working with it is to
11 react it out.

12 (b) (6), (b) (7)(C) So just basically just dumping
13 it into the water in the pit and --

14 (b) (6), (b) (7)(C): Yes.

15 (b) (6), (b) (7)(C) : Can you expand on the slow
16 process? What kind of time is slow for you?

17 (b) (6), (b) (7)(C): Slow to me is that you'll take a
18 few of the drums and as you open them it's just they'll
19 even say pour slowly into the pit.

20 (b) (6), (b) (7)(C) : And pour slowly would mean?

21 (b) (6), (b) (7)(C): Well, the equipment picks up the
22 drum and then it turns it sideways. So instead of (makes
23 noise), you know, it's a click. We can pick up four at a
24 time and dump or we can pick up one at a time or two at a
25 time. So with it being a dusty, also and we've got water

1 going at the same time also, there's water in there. We
2 usually start anywhere from 15,000 to 3,000 gallons of
3 water in the pit already. Then as (b) (6), (b) (7)(C) dumping, they
4 will at times say leave water running, so it keeps the,
5 the dust down.

6 (b) (6), (b) (7)(C) You mean 1,500 to 3,000 gallons?

7 (b) (6), (b) (7)(C) Yes. Did I say it different?

8 (b) (6), (b) (7)(C) I just want to make sure we're clear
9 for the tape. You might have said 15,000. But it's 1,500
10 to about 3,000?

11 (b) (6), (b) (7)(C): 1,500 to 3,000, yes.

12 (b) (6), (b) (7)(C) : And based on your experience
13 slowly dumping the magnesium waste in the water, what,
14 what do you see, what happens usually?

15 (b) (6), (b) (7)(C): Nothing really.

16 (b) (6), (b) (7)(C) : Nothing?

17 (b) (6), (b) (7)(C): Yeah, it just goes in there. I've
18 at times, you know, I have -- I see -- (b) (6), (b) (7)(C) dump so many
19 batches, I can't remember this batch having magnesium and
20 another batch having magnesium. I do know (b) (6), (b) (7)(C) receive it
21 and (b) (6), (b) (7)(C) And it's a real process.

22 (b) (6), (b) (7)(C) : But there hasn't been any that
23 were like, oh, wow, that one did --

24 (b) (6), (b) (7)(C): No, no.

25 (b) (6), (b) (7)(C) : -- something we weren't

1 expecting?

2 (b) (6), (b) (7)(C): Correct.

3 (b) (6), (b) (7)(C): Do you remember if something would
4 bubble over, a reaction, any type of characteristic of, of
5 the treatment, itself?

6 (b) (6), (b) (7)(C): I have had stuff bubble over, but
7 not -- it wasn't magnesium, I don't believe.

8 (b) (6), (b) (7)(C): So in relation to magnesium, is it
9 safe to say -- is there anything -- well, let me put it
10 this way, is there anything unique about the reaction when
11 (b) (6), (b) (7)(C) put magnesium waste in the water that you remember?

12 (b) (6), (b) (7)(C): It seems it gets warm, you know, as
13 they go to stir it.

14 (b) (6), (b) (7)(C): Would it put off heat that you could
15 feel?

16 (b) (6), (b) (7)(C): No. You can just see it bubble a
17 little, bubble some.

18 (b) (6), (b) (7)(C): Yeah, sure. And do you ever remember
19 having any sort of, when (b) (6), (b) (7)(C) treating that, the
20 magnesium waste, do you ever remember having a reaction
21 that, you know, jog your memory, or is unusual, or
22 anything that stood out to you?

23 (b) (6), (b) (7)(C): No, sir.

24 (b) (6), (b) (7)(C) So while (b) (6), (b) (7)(C) are doing this
25 dumping, is there any talking about like how to control

1 any hydrogen that's coming off or anything like that? Was
2 hydrogen ever discussed as a possible hazard while doing
3 this?

4 (b) (6), (b) (7)(C): While doing this particular batch
5 or any batch?

6 (b) (6), (b) (7)(C) : Any batch of magnesium and
7 water.

8 (b) (6), (b) (7)(C): Yeah, (b) (6), (b) (7)(C) talk about hydrogen,
9 because you can cause a big problem there.

10 (b) (6), (b) (7)(C) : So what -- was there any steps
11 put in place to try to mitigate that hazard?

12 (b) (6), (b) (7)(C): That would be on (b) (6), (b) (7)(C) mix design
13 that (b) (6), (b) (7)(C) would read and that would be (b) (6), (b) (7)(C) steps that (b) (6), (b) (7)(C)
14 take.

15 (b) (6), (b) (7)(C) : So on the mix design, is that
16 different from the dump sheet or is that the same thing?

17 (b) (6), (b) (7)(C): It is separate. The dump sheet is
18 the one to where (b) (6), (b) (7)(C) get it and it tells (b) (6), (b) (7)(C) what (b) (6), (b) (7)(C)
19 supposed to have, and the count, and stuff. The mix
20 design also comes from the lab, but that's the one that
21 tells (b) (6), (b) (7)(C) the steps.

22 (b) (6), (b) (7)(C) : So the mix design tells (b) (6), (b) (7)(C) the
23 steps of how to dump it or is that the dump sheet?

24 (b) (6), (b) (7)(C): It tell (b) (6), (b) (7)(C) how to dump it and what
25 to mix with it. Dump sheet just tells (b) (6), (b) (7)(C) it's okay to

1 dump. It just is, you know, yeah, the name is confusing
2 thinking about it. But (b) (6), (b) (7)(C) get that sheet when they say
3 this batch is okay to dump.

4 (b) (6), (b) (7)(C) : Okay.

5 (b) (6), (b) (7)(C): And then (b) (6), (b) (7)(C) gather it or (b) (6), (b) (7)(C)
6 gathers it, brings it to (b) (6), (b) (7)(C) area, and then (b) (6), (b) (7)(C) line it out
7 and then (b) (6), (b) (7)(C) go through it to make sure everything matches
8 up to the dump sheet. Then (b) (6), (b) (7)(C) call into the lab, tell
9 them that (b) (6), (b) (7)(C) have a certain batch number in front of a
10 particular pit, and then that goes to receiving. And then
11 receiving contacts the lab and they kick (b) (6), (b) (7)(C) out a mix.

12 (b) (6), (b) (7)(C) : Okay. And so that in this case
13 for this, it would just be everything is all one, one
14 dump.

15 (b) (6), (b) (7)(C): I'm not sure, (b) (6), (b) (7)(C)

16 (b) (6), (b) (7)(C) .

17 (b) (6), (b) (7)(C) : So like a mix would be, I guess
18 for like an acid, if you're trying, trying to do like
19 acids and bases, you've got you add your acids, and then
20 this, and then this, and then this to get your, your mix,
21 is that how it works?

22 (b) (6), (b) (7)(C): Kind of like that, yes. Yes, yes.
23 Acids are usually last.

24 (b) (6), (b) (7)(C): Can I ask you a question? Is this
25 the mix design sheet that you're referring to? It's an

1 example of one.

2 (b) (6), (b) (7)(C): It doesn't look like it, because
3 it's too small. But it does show, yeah, mix number,
4 that's our mix number there.

5 (b) (6), (b) (7)(C): That here --

6 (b) (6), (b) (7)(C): -- that it was being -- yeah,
7 that's part of it. Usually, ours is just spread out and
8 that whole sheet shows off some, yeah. This is telling (b) (6), (b)
9 --

10 (b) (6), (b) (7)(C) : We'll mark this for the record
11 as Number 1.

12 (Exhibit 1 identified.)

13 (b) (6), (b) (7)(C): -- how to take the -- do it, silo
14 line, mix well, and (b) (6), (b) had a flag, mix well, add clay to
15 dry.

16 (b) (6), (b) (7)(C) : So for the record we'll mark this
17 as --

18 (b) (6), (b) (7)(C): So this isn't a particular one, but
19 it's very similar to -- you have signatures all over the
20 place, too, who is --

21 (b) (6), (b) (7)(C): Handwriting?

22 (b) (6), (b) (7)(C): Yes.

23 (b) (6), (b) (7)(C) : So that, that would be
24 considered not exactly what (b) (6), (b) (7)(C) used to, but probably a
25 mix design?

1 (b) (6), (b) (7)(C): It has a lot of the information on
2 it, yes.

3 (b) (6), (b) (7)(C) : Okay.

4 (b) (6), (b) (7)(C) Do you know what that is?

5 (b) (6), (b) (7)(C): It doesn't have a title on it.

6 (b) (6), (b) (7)(C) : Let me see if I can turn the
7 page here, maybe give you a little more. It looks like a
8 continuation. There's a mix order.

9 (b) (6), (b) (7)(C): Yeah.

10 (b) (6), (b) (7)(C) : So it would be part of that?

11 (b) (6), (b) (7)(C): So it looks like, yeah, all kind of
12 -- it is sent to (b) (6), (b) in two sheets. But, so that's the
13 drawings, itself. Yeah, maybe this looks -- I don't know,
14 it just seems like (b) (6), (b) have more signatures.

15 (b) (6), (b) (7)(C) : Yeah, that's it.

16 (b) (6), (b) (7)(C): Yeah. (b) (6), (b) have to certify the
17 person that is mixing it and stuff, ingredients added and
18 stuff.

19 (b) (6), (b) (7)(C): So that, that has a lot of the
20 information that's on a mix design sheet?

21 (b) (6), (b) (7)(C): Mm-hmm.

22 (b) (6), (b) (7)(C) But it doesn't look like one?

23 (b) (6), (b) (7)(C): No, not to me it doesn't. But it
24 does have the mix number on it, the MX-number on it.

25 (b) (6), (b) (7)(C) : And it says processed by

1 (b) (6), (b) (7)(C) .

2 (b) (6), (b) (7)(C) That's the lab technician.

3 (b) (6), (b) (7)(C): That's the lab, right?

4 (b) (6), (b) (7)(C)R: Mm-hmm.

5 (b) (6), (b) (7)(C): Okay.

6 (b) (6), (b) (7)(C): But maybe (b) (6), (b) (7)(C) have no signatures on
7 there because it wasn't completed.

8 (b) (6), (b) (7)(C) Well, there you go.

9 (b) (6), (b) (7)(C) It still has a spot, I'm saying,
10 just still who mixed it, you know.

11 (b) (6), (b) (7)(C) Here's a field sheet. Is this
12 part of it, too, maybe or is that something else?

13 (b) (6), (b) (7)(C): This is when it's ready to be
14 disposed of. And then this tells (b) (6), (b) (7)(C) -- (b) (6), (b) (7)(C) tell them where
15 (b) (6), (b) (7)(C) disposed of it, cell number here, section here, and the
16 foot marks. And then disposed by and then (b) (6), (b) (7)(C) put our
17 signature, initials there.

18 (b) (6), (b) (7)(C) So we'll mark this as Number 2
19 for the record. And we'll take a picture of it.

20 (Exhibit 2 identified.)

21 (b) (6), (b) (7)(C) And that would be after everything
22 has passed through the lab, after samples go to the lab.
23 And then (b) (6), (b) (7)(C) get the okay or it has to be remixed.

24 (b) (6), (b) (7)(C) Okay. So that's something (b) (6), (b) (7)(C)
25 do after everything is done.

1 (b) (6), (b) (7)(C) Mm-hmm.

2 (b) (6), (b) (7)(C) What would you call that?

3 (b) (6), (b) (7)(C) The disposal.

4 (b) (6), (b) (7)(C) Disposal record?

5 (b) (6), (b) (7)(C) Mm-hmm.

6 (b) (6), (b) (7)(C) Okay. So Number 2 is a disposal
7 record. So this mix design you said would be in between
8 the disposal record, before the disposal record I mean?

9 (b) (6), (b) (7)(C) It seems like the disposal is on

10 (b) (6), (b) (7)(C) yeah, (b) (6), (b) (7)(C) . (b) (6), (b) (7)(C) ,
11 where waste comes in.

12 (b) (6), (b) (7)(C) Yeah.

13 (b) (6), (b) (7)(C) And then (b) (6), (b) (7)(C)
14 (b) (6), (b) (7)(C). But anyway, with the work order sheet, itself,
15 it has the foot marks area, just like that, too. And (b) (6), (b)
16 put it in a little pocket so when it is released from the
17 lab (b) (6), (b) can take that batch number out and put (b) (6), (b) (7)(C) foot
18 marks on it.

19 (b) (6), (b) (7)(C) Okay.

20 (b) (6), (b) (7)(C) But also on the sheet, yes, that's
21 attached to the sheet.

22 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) ?

23 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) .

24 (b) (6), (b) (7)(C) Okay. With regards to magnesium
25 fine waste, would (b) (6), (b) (7)(C)

1 or you -- (b) (6), (b) (7)(C) or just
2 verifying the outside manifests matched the labels? What
3 (b) (6), (b) (7)(C)

4 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) also down there
5 at a time. But, yeah, (b) (6), (b) (7)(C) opened drums, but (b) (6), (b) (7)(C) had to be
6 cautious about it because it was a reactive material.

7 (b) (6), (b) (7)(C) Sure, yeah. Any specific
8 procedures around magnesium fines that you remember, that
9 you can tell us about related to that?

10 (b) (6), (b) (7)(C) Non-sparking tools is what (b) (6), (b) (7)(C)
11 handle that with.

12 (b) (6), (b) (7)(C) Okay. And were they -- the
13 magnesium fine waste, was it packed in oil usually, water?

14 (b) (6), (b) (7)(C) There was some that over time,
15 another customer would put them in oil.

16 (b) (6), (b) (7)(C) How about this, do you remember
17 the customer remanufacturing, anything about them that
18 when they sent their waste, was there anything -- was
19 there anything you remember about them specifically as a
20 generator?

21 (b) (6), (b) (7)(C) No.

22 (b) (6), (b) (7)(C) No, okay.

23 (b) (6), (b) (7)(C) Yeah. I didn't even know who this
24 customer was.

25 (b) (6), (b) (7)(C) Okay, okay. So the day of the

1 (b) (6), (b) (7)(C) Right?

2 (b) (6), (b) (7)(C) Right.

3 (b) (6), (b) (7)(C) But before (b) (6), (b) (7)(C)

4 (b) (6), (b) (7)(C)

5 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) .

6 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) . And

7 did (b) (6), (b) (7)(C) regarding this magnesium fine waste, what was

8 (b) (6), (b) (7)(C)

9 (b) (6), (b) (7)(C) , if you remember?

10 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) processed bulk loads coming in

11 and stuff. But can you say that again? Maybe I --

12 (b) (6), (b) (7)(C) And so just remember -- as

13 clear, as best you can remember, (b) (6), (b) (7)(C)

14 (b) (6), (b) (7)(C) in

15 regards to the magnesium fine waste.

16 (b) (6), (b) (7)(C) Nothing, because it was put into

17 storage. (b) (6), (b) (7)(C) .

18 (b) (6), (b) (7)(C) Why was it put into storage?

19 (b) (6), (b) (7)(C) Because it was not going to be

20 processed, so it has to go into storage. (b) (6), (b) (7)(C) can't leave

21 it where it came in and was unloaded at. (b) (6), (b) (7)(C) have to put

22 it in a storage area, (b) (6), (b) (7)(C)

23 (b) (6), (b) (7)(C) .

24 (b) (6), (b) (7)(C) And what, what goes in your

25 (b) (6), (b) (7)(C)

1 (b) (6), (b) (7)(C) ? Is there -- is
2 there a reason that you remember why that waste was put
3 off till Saturday?

4 (b) (6), (b) (7)(C) I didn't know it was going to be
5 processed, so no.

6 (b) (6), (b) (7)(C) Oh, did you think it was going
7 to be sent back or --

8 (b) (6), (b) (7)(C) No, I didn't know it was sent back,
9 I didn't -- nobody said anything about it being bad or not
10 matching fingerprints or anything. No, I think it was all
11 set up for batches, but to be processed this weekend I
12 didn't know anything about it.

13 (b) (6), (b) (7)(C) What usually would be a reason
14 or two that something would be held off, or put into
15 storage, or wouldn't be -- was it because you have a bunch
16 of waste in front of it, or is it capacity, or any other
17 reasons why it would be --

18 (b) (6), (b) (7)(C) Why (b) (6), (b) (7)(C) would put it off is what
19 you're asking?

20 (b) (6), (b) (7)(C) : Mm-hmm.

21 (b) (6), (b) (7)(C): Because, well, (b) (6), (b) (7)(C)
22 because it's an easy enough group, it's a Group E and it
23 can be processed any time. So (b) (6), (b) (7)(C) got acids and stuff.
24 So (b) (6) think that was what (b) (6), (b) (7)(C) that they wanted to
25 process, because they were out of room for other waste.

1 So there was no big hurry to do it.

2 (b) (6), (b) (7)(C) : Okay. Do you know, can you
3 remember in your (b) (6), (b) (7)(C) has the company
4 always been treating combustible dust and magnesium fines
5 or is this -- (b) (6), (b) (7)(C)
6 (b) (6), (b) (7)(C) ?

7 (b) (6), (b) (7)(C): I do not remember. I'm sorry.

8 (b) (6), (b) (7)(C) : That's all right. And you were
9 (b) (6), (b) (7)(C)

10 (b) (6), (b) (7)(C) --

11 (b) (6), (b) (7)(C): Yes.

12 (b) (6), (b) (7)(C) : Was that (b) (6), (b) (7)(C) in the same,
13 like the ventilation the same and electrical system the
14 same during the (b) (6), (b) (7)(C) ?

15 (b) (6), (b) (7)(C): Yes.

16 (b) (6), (b) (7)(C) : Nothing really hasn't changed?

17 (b) (6), (b) (7)(C): No.

18 (b) (6), (b) (7)(C) : No upgrades or anything?

19 (b) (6), (b) (7)(C) No.

20 (b) (6), (b) (7)(C) : The equipment that was used
21 inside the (b) (6), (b) (7)(C), was it just strictly the excavator or
22 was there other pieces of equipment that got used in
23 there?

24 (b) (6), (b) (7)(C): (b) (6), (b) (7)(C) would take bobcats in there or a
25 skid steer, sorry. (b) (6), (b) (7)(C) . But (b) (6), (b) (7)(C) would

1 take skid steers to put them in the storage overnight.
2 But the manlift would go in there, but that was just to
3 repair lights or replace lightbulbs and stuff like that.

4 (b) (6), (b) (7)(C) : Any forklifts or anything like
5 that?

6 (b) (6), (b) (7)(C) Forklift would go inside there
7 also.

8 (b) (6), (b) (7)(C) : And is that just to move drums
9 and things like that?

10 (b) (6), (b) (7)(C): Yeah, put plastic inside, put
11 things in order inside the building.

12 (b) (6), (b) (7)(C) : Was there a specific forklift
13 that was used in there?

14 (b) (6), (b) (7)(C): We have two forklifts out there at
15 the site and we used them both.

16 (b) (6), (b) (7)(C) : Do you know what they are or
17 what the --

18 (b) (6), (b) (7)(C): No.

19 (b) (6), (b) (7)(C) : -- brands are or anything? Is
20 that a pretty common occurrence using those forklifts in
21 there?

22 (b) (6), (b) (7)(C): Mm-hmm.

23 (b) (6), (b) (7)(C) : Would it be like daily or
24 weekly?

25 (b) (6), (b) (7)(C): I would say daily.

1 (b) (6), (b) (7)(C) : Do you receive any training
2 specifically for the hazards of magnesium dust?

3 (b) (6), (b) (7)(C): We have an 8-hour refresher course
4 and so they go over the dust that we received.

5 (b) (6), (b) (7)(C) : Okay. I think that's all my
6 questions. Do you have anything?

7 (b) (6), (b) (7)(C): Yeah. As far as the DEQ RCRA
8 inspections, were you involved with helping out with those
9 monthly interactions with DEQ personnel who would come
10 over and inspect and do their monthlies?

11 (b) (6), (b) (7)(C): (b) (6), (b) (7)(C)

12 (b) (6), (b) (7)(C) .

13 (b) (6), (b) (7)(C): You're probably familiar with (b) (6), (b) (7)(C)
14 (b) (6), (b) (7)(C)

15 (b) (6), (b) (7)(C): Yes.

16 (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) says nice things about you.

17 (b) (6), (b) (7)(C): I'll thank (b) (6), (b) (7)(C)

18 (b) (6), (b) (7)(C): Says hello.

19 (b) (6), (b) (7)(C): Tell (b) (6), (b) (7)(C) hi, yeah. (b) (6), (b) (7)(C) a nice
20 guy.

21 (b) (6), (b) (7)(C): Would there be any reason, have you
22 ever heard rumors of or do you know about any activity out
23 there that some workers would do to cover up gauges when
24 it would come to trying to pass the monthly DEQ
25 inspection?

1 (b) (6), (b) (7)(C) No, sir.

2 (b) (6), (b) (7)(C): Any reason that you know of, to
3 believe that someone else would be trying to do that? I
4 mean you're a (b) (6), (b) (7)(C). You might have an (b) (6), (b) (7)(C) or
5 a (b) (6), (b) (7)(C) , or someone who may not be doing everything
6 up to par?

7 (b) (6), (b) (7)(C): No, sir. I wouldn't think of
8 anybody doing that.

9 (b) (6), (b) (7)(C): All right.

10 (b) (6), (b) (7)(C) : (b) (6), (b) (7)(C) you spent (b) (6), (b) (7)(C) out
11 there. Anything you want to add? I don't want to
12 undermine the severity or the event that happened. It's
13 tragic and we're all aware of the gravity of that.

14 (b) (6), (b) (7)(C): Right.

15 (b) (6), (b) (7)(C) But anything you want to add,
16 you know, with (b) (6), (b) (7)(C) to add to the -- do you know
17 anything you felt (b) (6), (b) (7)(C) could have done different? It
18 sounds like you've got a pretty good process out there.
19 But wanted to -- is there anything you can tell me?

20 (b) (6), (b) (7)(C): No. I was just devastated. I was
21 totally surprised. Never dreamed of it, never. I wasn't
22 afraid of it, you know. You handle it the way you're
23 supposed to handle whatever you're handling. We handle a
24 lot of different stuff and different areas. I was
25 devastated. (b) (6), (b) (7)(C) , you know. I didn't feel

1 like it was safe. My family wouldn't want me there. I
2 (b) (6), (b) (7)(C) . (b) (6), (b) (7)(C) . You could
3 talk to anybody, you know. If something wasn't working
4 right, I (b) (6), (b) (7)(C) a good relationship with the (b) (6), (b) (7)(C)
5 (b) (6), (b) (7)(C) . No, I was just
6 totally devastated it ever happened.

7 (b) (6), (b) (7)(C) : Yeah. Well, that's all the
8 questions I have. I appreciate your time, your service
9 out there.

10 (b) (6), (b) (7)(C): Thank you.

11 (End of Interview)

12 CERTIFICATION

13 I, (b) (6), (b) (7)(C) , court approved transcriber,
14 certify that the foregoing is a correct transcript from
15 the official electronic sound recording of the proceedings
16 in the above-entitled matter.

17
18
19 /s/(b) (6), (b) (7)(C) 05/01/2023

20 Burke Court Reporting & Transcription
21
22
23
24
25

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